

REMARKS:

In response to the Office Action mailed on August 11, 2003, Applicant wishes to enter the following remarks for the Examiner's consideration. Applicant has amended claims 4 and 12. Claims 1-18 are pending in the application. Applicant has modified the line numbering of claims 1-18 so that each claim is line numbered and each claim starts with line number 1.

Drawing Objection

Applicant notes that the FIGs. 1 and 2 of the drawings, filed on March 13, 2002, did not label the elements of the figures and were intended to facilitate translation for foreign filing purposes. Applicant herewith submits replacement sheets of FIGs. 1 and 2 that correspond to the labeling found in the informal drawings filed on October 31, 2001.

Claim Rejections 35 USC §112

Claim 4 is rejected under 35 USC 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as invention. In response to the Examiners's rejection of claim 4, Applicant has amended claim 4 and also claim 12 to replace the words "techniques are" with "technology is". Applicant notes that the use of the term "technology" is supported by the specification on page 8, lines 22-24.

Claim Rejections 35 USC 102(e)

Claims 1-4, 6-7, 9-12, 14-15, 17 and 18 are rejected under 35 USC 102 (e) as being anticipated by Bacon, US Patent No. 6,307,528. This rejection is traversed as being improper because the Bacon reference does not contain every element and limitation as contained in and arranged as recited in the claims. Contrary to the Examiner's statement that all elements are disclosed in the Bacon reference, many of the elements are not, as discussed below; the rejection is thus unsupported by

the art and should be withdrawn. The Examiner is respectfully directed to MPEP §2131 which provides:

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described in a single prior art reference." *Verdegaal Bros. V. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 *Fed. Cir. 1989). The elements must be arranged as required by the claim.

Claim 1

The Examiner states at page 3 of the response that Bacon shows all the elements of claim 1, where:

a flow of serial data corresponds to [46, fig. 1]
an RF enclosure corresponds to [20, fig 1;76, fig 3]
a processor corresponds to [21]
a serial control data bus corresponds to [bus between 46 and 54];
an interface electronics module corresponds to [46]
an electronics module within the RF enclosure corresponds to [76, fig 3].

As a response to the Examiner's assertion of a correspondence existing between elements of claim 1 and elements of the Bacon reference, Applicant would like to note that:

1. Examiner has stated a correspondence between various elements of claim 1 and what is taught by Bacon, but Examiner has not shown where Bacon teaches "A **method** of controlling a flow of serial data across an Radio Frequency (RF) barrier of an RF enclosure". Bacon does not teach a flow of serial data across an RF barrier, a method of controlling such a flow or even an RF barrier of an RF enclosure. Bacon teaches a system for RF shielding of peripheral devices such as a mouse or keyboard that are attached to a computer [col. 2, abstract], but there is no mention of an RF enclosure with an RF barrier, or a flow of serial data across an RF barrier. And, significantly, the Examiner has not noted with particularity

where such teaching of an RF barrier, a flow of serial data across an RF barrier or a method of controlling such a flow occurs in the Bacon reference.

2. Examiner has not stated where Bacon teaches the element "receiving the one or more lines of the serial control data bus and selecting one or more signals corresponding to one or more **addresses** of the one or more lines". This aspect of the Applicant's claim 1 is not taught, disclosed, suggested or rendered obvious by Bacon. And, significantly, the Examiner has not noted with particularity where such teaching occurs in the Bacon reference.
3. A reading of Bacon shows that Bacon teaches an input device that can be connected to a computing device having a housing having transducer electronics capable of manipulating an electrical signal indicating movement of a portion of a user [col. 2, abstract]. Thus Bacon does not teach, disclose, suggest or render obvious how to control a flow of serial data across an RF barrier. And, significantly, the Examiner has not noted with particularity where such teaching occurs in the Bacon reference.
4. Examiner states that the RF enclosure of Applicant's claim 1 corresponds to [20, fig 1; 76, fig 3] of Bacon. However, a reading of Bacon indicates that 20 is a conventional personal computer [col. 2, line 67], while 76 is a device housing, such as a mouse, joystick, gamepad or keyboard [col 4, lines 17-20]. A computer is not an RF enclosure, and neither is a mouse, joystick, gamepad or keyboard. Thus Applicant respectfully submits that the RF enclosure of Applicant's claim 1 does not correspond to element 20 or element 76 of Bacon.
5. Examiner states that the bus between 46 and 54 is the serial control data bus, of Applicant's claim 1. A reading of Bacon teaches that 46 is a serial port interface [col. 3, lines 44-46] and 54 is a modem [col 4, 5-7]. As taught by Bacon on col. 4, lines 1-5, personal computer 20 typically includes a modem 54 or other means for establishing communications over wide area network 52, such as the Internet. Examiner has stated that processor [21, col. 3, line 1] sends control data using the serial control bus, but Bacon teaches that the processor [21] is not coupled to

the serial control data bus, the modem [54] is. And, as mentioned above, Bacon does not teach, suggest, disclose, or otherwise obviate the use of modem [54] for "sending one or more control data using one or more lines of a serial control data bus". And, significantly, the Examiner has not noted with particularity where such teaching occurs in the Bacon reference.

6. Applicant further notes that even if 46 is taken to be the serial port interface, Bacon does not teach the use of 46 in "sending the selected one or more signals to an electronics module within the RF enclosure", since there is no teaching within Bacon that 46 selects the "one or more signals" of the Applicant's claim 1.

In light of the above arguments, Applicant respectfully notes that there are many differences between the recitations of Applicant's claim 1 and what is taught by Bacon. Applicant respectfully requests reconsideration and allowance of claim 1 and its dependent claims at the Examiners earliest convenience.

Referring to **claim 2**, Examiner states that Bacon shows selecting each signal with a same line value [46]. Examiner references element 46 of Bacon, which is a serial port interface [col. 3, lines 44-46]. However, Examiner has not noted where Bacon shows "selecting each signal with a same line value" occurs within the Bacon reference. The use of a serial port interface does not necessarily include the ability to select each signal with a same line value. And, significantly, the Examiner has not noted with particularity where such teaching occurs in the Bacon reference. Reconsideration and allowance of claim 2 is therefore respectfully requested at the Examiner's earliest convenience

Referring to **claim 7**, Examiner states that Bacon shows an RF filtered connector [92, 72, fig 3]. However, a reading of Bacon [col. 4, lines 15-17 and 60-62] teaches that 92 is an isolator and 72 is a connector housing, neither of which is an RF filtered connector. Reconsideration and allowance of claim 7 is therefore respectfully requested at the Examiner's earliest convenience.

Claims 2-8 and 17-18 depend from claim 1. Although additional arguments could be made for the patentability of each of these claims, such arguments are believed unnecessary in view of the above discussion of claim 1. The undersigned wishes to make it clear that not making such arguments at this time should not be construed as a concession or admission to any statement in the Office Action.

Referring to **claims 9-12** and **14-15**, Examiner states that Bacon teaches the method steps of claims 1-4 and 6-7 and therefore Bacon also teaches the apparatus to carry out the method steps. Applicant asserts that the response to the rejection of claims 1-8 has overcome the Examiner's rejection of claims 1-8, and similar arguments may be put forth for claims 9-12 and 14-15. Applicant therefore respectfully submits that the rejection of claims 9-12 and 14-15 has also been overcome.

Applicant further strenuously objects to the Examiners line of reasoning, at the top of page 4 of the office action, that Bacon could even teach the apparatus to carry out the Applicant's invention. Even if Applicant assumes that a prior art reference contains the method steps of claims 1-4, and 6-7, there is no teaching or legal grounds to infer that such prior art reference inherently teaches the apparatus of the Applicant's claim as suggested by the Examiner. And, significantly, Examiner has not noted with particularity where such teaching of the apparatus of claims 9-12 and 14-15 occurs in Bacon. Reconsideration and allowance of claims 9-12 and 14-15 is therefore respectfully requested at the Examiner's earliest convenience.

Claim Rejections 35 USC §103

Claims 5, 8, 13, and 16 are rejected under 35 USC 103(a) as being unpatentable over Bacon, as applied to claims above. Examiner acknowledges that Bacon fails to teach an SPI bus, and Schmitt trigger input buffers. Examiner states it would have been obvious to one of skill in the art to include the SPI bus for a more flexible system by allowing it to operate in multiple configurations, and Schmitt trigger input buffers for having a more reliable system.

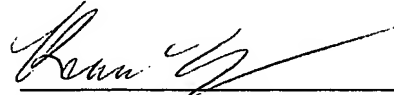
Applicant respectfully submits that these claims depend from claims which also contain patentable subject matter, as discussed above, and thus respectfully declines to make such amendment at this time. However, in the event that the rejection of the underlying base claims is maintained, Applicant herewith reserves the right to amend these claims.

In light of the foregoing amendments and remarks, applicant submits that the 35 U.S.C. 112, second paragraph, rejection of claim 4, the 35 U.S.C. 112(e) rejections of claims 1-4, 6-7, 9-12, 14-15, 17 and 18, and the 35 USC 103(a) rejections of claims 5, 8, 13, and 16 have been overcome. The scope of the amended independent claims 4 and 12 is substantially the same. Reconsideration and allowance of claims 1-18 is therefore respectfully requested at the Examiner's earliest convenience. Although additional arguments could be made for the patentability of each of the claims, such arguments are believed unnecessary in view of the above discussion. The undersigned wishes to make it clear that not making such arguments at this time should not be construed as a concession or admission to any statement in the Office Action.

No amendment made herein was related to the statutory requirements of patentability unless expressly stated herein. No amendment made was for the purpose of narrowing the scope of any claim unless an argument has been made herein that such amendment has been made to distinguish over a particular reference or combination of references.

Please contact the undersigned if there are any questions regarding this response or application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Renee' Michelle Larson", is written over a horizontal line.

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